Exhibit 21 Pennsylvania Proposals

<u>**MDL 3047 – 2024-12-09 Agency Discovery JLB**</u>
<u>**Pennsylvania – Meta Proposal**</u>

Search Terms: Meta made its most recent counterproposal on November 22, 2024 to the Pennsylvania (i) Department of Communities and Economic Development, (ii) Department of Education, (iii) Department of Health, (iv) Department of Human Services, (v) Governor's Office, and (vi) Office of the Budget.

At a high level, Meta's proposal involves using search combinations that require either "Social Media Terms" or substantive "Harm Terms" to occur together with an "AND" connector of one of the following "Youth Terms":

> (teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR "under-age" OR juvenile* OR "pre-teen*" OR preteen* OR "U18" OR "under 18" OR "U13" OR "under 13" OR "gen* z" OR "gen-z" OR "gen* alpha" OR gen-a* OR scholar* OR School* OR student* OR pupil* OR grade*)

#	Social Media Terms
1	"Youth Terms" **AND** ("social media" OR "social network" OR Meta OR Facebook OR Instagram OR "Insta" OR Youtube OR Snapchat OR Snap OR Bytedance OR TikTok OR Twitter OR Tweet OR Roblox OR Discord OR Twitch OR Netflix OR Reddit OR Pinterest OR Tumblr OR telegram OR signal OR viber OR threema OR wechat OR kik OR textplus OR wickr OR troop OR YikYak OR "Yik Yak" OR finsta OR FB OR IG OR YT OR TT OR DM* OR "direct message")
	Harm Terms
2	"Youth Terms" **AND** (wellness OR wellbeing OR well-being OR confidence OR self-confidence OR "mental health" OR "TMH" OR "ACE*" OR "adverse childhood experience" OR anxi* OR anti-anxi* OR depress* OR antidepress* OR sad* OR reclus* OR stress OR "attention deficit" OR "ADHD" OR posttraumatic OR "bi-polar" OR "bi polar" OR bipolar OR "BPD" OR insomnia OR scar* OR afraid OR angry OR mad OR worr* OR lonel* OR alone OR therap* OR counsel* OR treatment*)
3	"Youth Terms" **AND** ("pro-ana" OR "BMI" OR overweight OR fat OR obes* OR diet* OR anorexi* OR bulimi* OR orthorexi* OR appetite OR dysmorph* OR binge OR purge OR suicid* OR "self harm" OR "self-harm" OR selfharm OR unalive OR cutting*)
4	"Youth Terms" **AND** (bully* OR bullie* OR cyberbull* OR harass* OR sextort* OR transphob* OR homophob* OR racis* OR sexis* OR groom* OR hookup* OR solicit* OR pedophil* OR predator* OR sex* OR extort OR exploit*)
5	"Youth Terms" **AND** (violen* OR abus* OR assault* OR fight* OR altercation OR misbehav* OR misconduct* OR shoot* OR shot OR threat* OR gun* OR pistol OR rifle OR firearm OR rape* OR murder* OR traff* OR hate*)

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6	"Youth Terms" **AND** (addic* OR hook* OR dopamine OR rabbithol* OR spiral OR "social reward" OR "social approval" OR "screen time" OR screentime staytime OR timespent OR "time spent" OR "engagement" OR impression* OR "monthly active users" OR "daily active users" OR "monthly active people" OR "daily active people" OR "weekly active users" OR "mandatory break" OR "limiting tool" OR "habit loop" OR "operant conditioning" OR "impulse control")
7	"Youth Terms" **AND** (eat* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*))
8	"Youth Terms" **AND** (sleep* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*))
9	"Youth Terms" **AND** (negative w/3 (appearance OR experience OR affect* OR effect*))
10	"Youth Terms" **AND** (compar* w/5 (appearance OR social OR other* OR negative))
11	"Youth Terms" **AND** (body w/3 (accept* OR dissatisfaction OR positiv* OR image OR dysmorph*))
12	"Youth Terms" **AND** (self w/3 (esteem OR harm OR control OR injur* OR mutilat* OR regulat*))
13	"Youth Terms" **AND** (Covid* OR coronavirus OR pandemic OR lockdown OR "lock* down" OR quarantine OR "social* distanc*")
14	"Youth Terms" **AND** (svap* OR "ecig" OR "e-cig" OR cig* OR smok* OR nicotine OR tobacco OR pot OR cannabis OR marijuana OR heroin OR crack OR cocaine OR fent* OR opio* OR opia* OR meth OR methamphetamine OR oxy OR oxycontin OR painkiller* OR narcotic* OR drug* OR alcohol* OR Juul)
	Youth Social Media Policy Initiatives
15	"Youth Terms" **AND** (polic* OR practice* OR presentation OR assembl* OR initiative* OR interven* OR prevent* OR limit* OR control* OR legislation OR advocacy OR lobby* OR legislat* OR law OR suspend* OR revok* OR fine* OR sanction* OR cancel* OR abandon* OR ban OR banned OR banning OR concern* OR problematic OR investigat* OR criminal OR charges OR conviction* OR arrest* OR "law enforcement" OR deceptive OR decei* OR fraud* OR defraud* OR cheat* OR lie* OR misrepresent* OR mislead* OR schem* OR exploit* OR trick* OR conceal* OR hide OR omit* OR downplay* OR suppress* OR "cover up" OR "Consumer Protection Act" OR "consumer protection")

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Custodians: Meta proposes that the above search terms be run on each agency's custodial documents (including email and other custodial data sources), and relevant non-custodial data sources, that cover the entire period from January 1, 2012 to April 1, 2024, which encompasses the same time period from which Plaintiffs seek discovery, and have plead as the "Relevant Time[]" in Plaintiffs' Complaint. *See* ECF No. 969; MDL Compl. ¶ 19 (alleging a "Relevant Time[]" that starts "no later than 2012").

Despite the Court's orders, Pennsylvania has yet to identify any custodians from the relevant agencies. Based on limited publicly-available information, Meta proposes that the search terms set forth above should be run against at least the custodians listed below. Meta further requests that the Court require the Pennsylvania agencies to supplement this list with additional custodians that cover the full proposed time period and all relevant discovery topics within three days of the Court's order resolving this dispute. Meta reserves the right to request additional custodians in a meet and confer to be scheduled promptly after the agencies' disclosure of a supplemental proposed custodian set.

Agency	Custodian	Title
Department of Communities and Economic Development	Rick Siger	Secretary
Department of Communities and Economic Development	Jen Gilburg	Deputy Secretary Technology and Entrepreneurship
Department of Communities and Economic Development	Brent Vernon	Sr. Managing Director Project & Account Management
Department of Communities and Economic Development	Aaron Pitts	Chief Commercial Officer Department of Community and Economic Development
DOE	Angela Fitterer	Acting Secretary of the Pennsylvania Department of Education
DOE	Shante' Brown	Deputy Secretary of Child Development and Early Learning

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Agency	Custodian	Title
DOE	Dr. Carrie Rowe	Deputy Secretary of Elementary and Secondary Education
DOE	Dr. Gina Colarossi	Special Advisor to the Secretary
DOE	Cathy Hall	Special Assistant to the Secretary
DOE	Julie Kane	Director of Policy
DOE	Stephen Latanishen	Director of Legislative Affairs
DOE	Karen Molchanow	Executive Director State Board of Education
DOH	Dr. Debra L. Bogen	Secretary of Health
DOH	Kristen Rodack	Executive Deputy Secretary
DOH	Muneeza Iqbal	Deputy Secretary of Health Resources and Services
DOH	Cindy Findley	Deputy Secretary, Health Promotion and Disease Prevention
DHS	Valerie A. Arkoosh	Secretary of Human Services
DHS	Laval Miller-Wilson	Deputy of Office of Children, Youth, and Families
DHS	Shantè Brown	Deputy of Office of Child Development and Early Learning
DHS	Jen Smith	Deputy of Office of Mental Health and Substance Abuse Services
DHS	Hoa Pham	Deputy of Office of Income Maintenance
DHS	Scott Talley	Director of Bureau of Children's Behavioral Health Services
Governor's Office	Akbar Hossain	Secretary of Policy and Planning

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Agency	Custodian	Title
Governor's Office	Dr. Latika Davis-Jones	Secretary of the Department of Drug and Alcohol Programs
Office of the Budget	Uri Monson	Secretary of the Budget
Office of the Budget	Brenda Warburton	Executive Deputy Secretary of the Budget
Office of the Budget	Natalie Krug	Deputy Secretary for Budget Operations